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Attorneys for Defendant:
CHARLES BARRETT

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

CHARLES BARRETT,
Defendants.

Case No. 1:22-CR-00213 JAM-BAM
DEFENSE PROPOSED VOIR DIRE

The defense hereby submits the following Voir Dire for the court's consideration and review.

PSYCHOLOGICAL TESTIMONY

1. Have you ever known anyone who consulted with a psychologist or psychiatrist?
2. What do you think about psychologists or psychiatrists?
3. Have you or anyone you have ever known suffered from a mental illness?
-Would you mind telling us about that?

1 4. If there is testimony that an individual in this case suffered from a mental illness, will that
2 influence your evaluation of that person's testimony?

3 **SEXUAL ASSAULT**

- 4 1. Have you, any family member or close friend ever been the victim of any type of sexual
5 assault? ☐ YES ☐ NO, If YES, please explain:
6
7 2. Have you ever heard of a situation where a person was sexually assaulted but did not
8 immediately report the incident? ☐ YES ☐ NO, If YES, why didn't that person report the
9 incident right away?
10 3. Have you ever known of a situation where a person claimed to have been sexually
11 assaulted and the person who was accused of the assault claimed that the other person
12 consented? ☐ YES ☐ NO, If YES, what was your reaction to that situation?
13 4. Do you know anyone who falsely claimed to have been the victim of a sexual assault?
14 ☐ YES ☐ NO, If YES, what were your feelings about that situation?
15 5. Have you, any family member or close friend ever worked or volunteered at any rape
16 crisis center, crisis hotline, shelter for abused women, or any similar organization?
17 ☐ YES ☐ NO, If YES, please tell us which organization(s) and why you/they chose to
18 work or volunteer:
19 6. Have you, any family member, or close friend ever worked or trained as a psychologist,
20 psychiatrist, social worker, counselor, or in any related area working with sexual abuse
21 victims? ☐ YES ☐ NO, If YES, please explain:
22 7. Do you know anyone who suffers from Post Traumatic Stress Disorder (PTSD) from a
23 sexual assault? ☐ YES ☐ NO, If YES, please explain:

24 **I. FALSE ACCUSATIONS**

- 25 1. If a person claims that she was raped several times, what would be more reliable proof
26 that something did happen, the testimony from the person or physical evidence that
27 something happened? Why do you feel this way?
28 2. Who would have doubts about the charges if there was no physical evidence of rape?

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RIGHT TO TESTIFY

1. Mr. Barrett is going to exercise his right to remain silent, and not testify. How many of you here will hold it against Charles Barrett for not testifying?
2. Mr. Barrett has been in-custody since August 29, 2022, is there anyone here who will hold that against him? If so, why?

Dated: January 30, 2024,

Respectfully Submitted,
/s/ Timothy P. Hennessey
Timothy P. Hennessey
Attorney for Defendant
Charles Barrett

Dated: January 30, 2024

Respectfully Submitted,
/s/ David A Torres
DAVID A. TORRES
Attorney for Defendant
Charles Barrett